

Exhibit A

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6 Attorney for Creditor Charles Li

7 UNITED STATES BANKRUPTCY COURT

8 NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

9 In Re:

10 LEGAL RECOVERY, LLC

11 Debtor,

Case No.: 24-30074
Chapter 11

**ORDER AUTHORIZING
EXAMINATION OF AND
PRODUCTION OF DOCUMENTS BY
DEMAS YAN PURSUANT TO
BANKRUPTCY RULE 2004**

12 This matter came before the Court without a hearing upon consideration of
13 *Creditor Charles Li’s Ex Parte Application for an Order Pursuant to Bankruptcy Rule*
14 *2004 Authorizing Examination and Production of Documents by Demas Yan, the*
15 *Manager of Debtor Legal Recovery, LLC* (the “**Application**”). Based upon the Court’s
16 review of the Application, and good cause appearing therefore,

17 **IT IS HEREBY ORDERED** that

18 1. The Application is granted, and Creditor Charles Li may issue a
19 subpoena pursuant to this order; and

20 2. Demas Yan shall appear for an oral examination on July 19, 2024
21 at 10:00 a.m. and shall produce documents described below before close of business on
22 July 15, 2024, or on such other dates as may be agreed to in writing between Charles Li
23 and Demas Yan, with both the oral examination and the production to take place at the

1 law offices of Duy Thai at Jan Brown & Associates, Court Reporters, 701 Battery Street,
2 San Francisco, California.

3 **DOCUMENTS TO BE PRODUCED BY DEMAS YAN**

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5 **DEFINITIONS AND INSTRUCTIONS**

6 A. "DEBTOR" means Legal Recovery, LLC.

7 B. "YOU" and "YOUR" mean Demas Yan.

8 C. "DOCUMENT" or "DOCUMENTS" is used in the broadest sense possible
9 and includes, without limitation, any writings as defined by Rule 1001 of the Federal
10 Rules of Evidence and electronically stored information as described by Rule
11 34(b)(2)(E). In particular, "DOCUMENT" includes both originals and copies, as well as
12 electronically stored information that is stored in any medium from which information
13 can be obtained.

14 D. "TRANSFER" means a transfer of cash or other property, including by means
15 of check, wire transfer, debit or credit to an account, or the exchange of inventory or
16 other property.

17 E. Each request contained herein extends to any DOCUMENTS in YOUR
18 possession, custody or control. A DOCUMENT is deemed to be in YOUR possession,
19 custody or control, (1) if it is in YOUR physical custody, or (2) if it is in the physical
20 custody of any other person and YOU (a) own such DOCUMENT in whole or in part; (b)
21 YOU have a right by contract, statute or otherwise to sue, inspect, examine or copy such
22 DOCUMENT on any terms; (c) YOU have an understanding, express or implied, that
23 YOU may use, inspect, examine or copy such DOCUMENT on any terms; or (d) YOU
24 have, as a practical matter, been able to use, inspect, examine or copy such DOCUMENT
25 when YOU have sought to do so. Such DOCUMENTS shall include, without limitation,
26 DOCUMENTS that are in the custody of YOUR attorneys or other agents.

27 F. If a DOCUMENT exists only within the memory of a computer or computer
28 disc, a copy of that data should be produced in machine-readable form (i.e., native

1 format), and a “hard” copy of the DOCUMENT should be printed and produced, unless
2 otherwise agreed to in writing between YOU and counsel for Creditor Charles Li.

3 G. Unless otherwise stated, all document requests are for the period of January 1,
4 2019 through present.

5 **DOCUMENTS TO BE PRODUCED**

6 1. All DOCUMENTS relating to or constituting any operating agreements of
7 DEBTOR.

8 2. All DOCUMENTS relating to the formation of DEBTOR.

9 3. All tax returns on which any income or expense for DEBTOR has ever
10 been reflected.

11 4. All DOCUMENTS related to USA National Title Company Escrow No.
12 182001923-JG.

13 5. All DOCUMENTS relating to communications or financial transactions
14 with Meiling Fang.

15 6. All DOCUMENTS relating to any assignment of any asset by Meiling
16 Fang to DEBTOR.

17 7. All DOCUMENTS relating to any interest Meiling Fang holds in
18 DEBTOR.

19 8. All DOCUMENTS relating to communications or financial transactions
20 with Tina Yan.

21 9. All DOCUMENTS relating to communications or financial transactions
22 with Shuzhen Tu.

23 10. All DOCUMENTS relating to 689 13th Street, San Jose, California.

24 11. All DOCUMENTS relating to 1052 Noble Lane, San Jose, California.

25 12. All DOCUMENTS relating to 547 23rd Avenue, San Francisco,
26 California.

27 13. All DOCUMENTS relating to Noble Lane LLC.

28 14. All DOCUMENTS relating to Legal Associates, Inc.

- 1 15. All DOCUMENTS relating to Legal Affiliates Inc.
- 2 16. All DOCUMENTS relating to Apartments.com.
- 3 17. All DOCUMENTS relating to CoStar.
- 4 18. All DOCUMENTS relating to Cozy.
- 5 19. All DOCUMENTS relating to a December 5, 2019 Zelle transaction from
- 6 DEBTOR's Wells Fargo account no. ending in 8660 to Shuzhen Tu.
- 7 20. All DOCUMENTS relating to a December 20, 2019 Zelle transaction
- 8 from DEBTOR's Wells Fargo account no. ending in 8660 to Shuzhen Tu.
- 9 21. All DOCUMENTS relating to a March 17, 2020 Zelle transaction from
- 10 DEBTOR's Wells Fargo account no. ending in 8660 to Shuzhen Tu.
- 11 22. All DOCUMENTS that relate to or reflect books and records of the
- 12 DEBTOR in any format from January 1, 2019 through present, including, but not limited
- 13 to all financial and accounting records, bank statements, cancelled checks, deposit tickets,
- 14 and investment statements of the DEBTOR.
- 15 23. All data in native format pertaining to the DEBTOR from any accounting
- 16 system currently or previously maintained by the DEBTOR or anyone on behalf of the
- 17 DEBTOR.

18 **** END OF ORDER ****

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